

# COUNTY OF SUFFOLK



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October 1, 2020

Hon. A. Kathleen Tomlinson, U.S.M.J.  
United States District Court, Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, New York 11722

Re: McCune v. County of Suffolk  
CV14-4431(JS)(GRB)

Dear Judge Tomlinson:

The Suffolk County Attorney's Office represents defendants in this § 1983 action. Respectfully, defendants submit this letter as a joint request for a sixty-day extension of the discovery schedule.

Since the COVID pandemic has eased sufficiently to permit videoconference depositions to be conducted, plaintiff has been deposed. Depositions of two defendants have now been scheduled. Counsel are in the process of scheduling the deposition of a third defendant, and are also discussing the possibility of a fourth defense deposition. The requested extension will afford the parties sufficient time to complete the depositions, as well as to address any further discovery that may be required as a result of the depositions.

We thank the Court for its time and attention to this case.

Respectfully submitted,

Dennis M. Cohen  
Suffolk County Attorney

By: /s/ Arlene S. Zwilling  
Arlene S. Zwilling  
Assistant County Attorney